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COMMISSION

2016 MAY 26 AM 9:11

**Respondents:** Tom MacArthur for Congress and  
Ronald Gravino as treasurer  
(the "Committee")  
Tom MacArthur

**SENSITIVE**

16 MAY 26 AM 9:41

**52 U.S.C. § 30120(d)(1)(B)**  
**11 C.F.R. § 110.11(c)(3)**

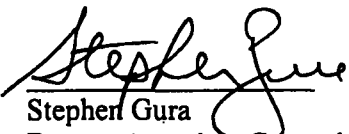
Based on its experience and expertise, the Commission has established an Enforcement Priority System using formal, pre-determined scoring criteria to allocate agency resources and assess whether particular matters warrant further administrative enforcement proceedings. These criteria include (1) the gravity of the alleged violation, taking into account both the type of activity and the amount in

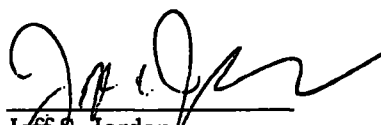
violation; (2) the apparent impact the alleged violation may have had on the electoral process; (3) the complexity of the legal issues raised in the matter; and (4) recent trends in potential violations and other developments in the law. This matter is rated as low priority for Commission action after application of these pre-established criteria. Given that low rating and the other circumstances presented, we recommend that the Commission dismiss the allegations consistent with the Commission's prosecutorial discretion to determine the proper ordering of its priorities and use of agency resources. *Heckler v. Chaney*, 470 U.S. 821, 831-32 (1985). We also recommend that the Commission close the file as to all respondents and send the appropriate letters.


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for Enforcement

5.26.16  
Date

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